UNITED STATES DISTRICT COURT
NORTHER DISTRICT OF TEXAS
DALLAS DIVISION

SUSAN CHANG, as Next Friend of Alison Chang, a minor, And Justin Ho-Wee Wong	§	
	§	
Plaintiffs,	§	CAUSE NO. 3:07-CV-01767
v.	§	
	§	
Virgin Mobile Pty Ltd.,	§	
	§	
Defendant.	§	

UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE SCHEDULING PROPOSAL

Plaintiffs respectfully request that the Court extend the deadline to file the Parties' Scheduling Proposal for a period of sixty days until Friday, February 15, 2008. This extension is requested because the only remaining Defendant, Virgin Mobile Pty, Ltd., is not required to file an answer or otherwise respond to Plaintiffs' claims until December 20, 2007. It is not until after this time that the parties will be able to meaningfully discuss a potential resolution or any of the other issues addressed in Section IV of this Court's Order for a Proposed Scheduling Order. The parties believe that this sixty-day extension will provide them with adequate time to meet, confer and craft a mutually agreeable plan.

Respectfully submitted,

/s/ Ryan H. Zehl____________________
Ryan H. Zehl
State Bar No. 24047166
Fitts Zehl, LLP
5065 Westheimer Rd., Suite 700
Houston, Texas 77056
(713) 491-6064 (telephone)
(713) 583-1492 (facsimile)
rzehl@fittszehl.com

Mark W. Romney
State Bar No. 17225750
Shannon, Gracey, Ratliff
& Miller, LLP
500 N. Akard Street, Suite 2500
Dallas, Texas 75201
(214) 245-3062 (telephone)
(214) 245-3097 (facsimile)
mromney@shannongracey.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I certify, pursuant to Local Rule 7.1, that I conferred with Lisa Meyerhoff, counsel for Defendant Virgin Mobile Pty, Ltd. on November 27, 2007 and that she consented to the parties' Joint Motion to Extend the Deadline to File a Scheduling Proposal.

/s/ Ryan H. Zehl__________
Ryan H. Zehl

CERTIFICATE OF SERVICE

I hereby certify that on the 28 day of November, 2007, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. The system sent a "Notice of Electronic Filing" to the following attorneys of record, all of whom have consented to accept this Notice as service of the document:

Lisa H. Meyerhoff
Baker & McKenzie LLP
2001 Ross Ave.
Dallas, Texas 75201

/s/ Ryan H. Zehl______________________
Ryan H. Zehl